

THE STROJNIK FIRM LLC

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January 3, 2012

The Honorable Dickinson R. Debevoise
District Court Judge
United States District Court, District of New Jersey
50 Walnut Street
Newark, New Jersey 07102

VIA ELECTRONIC FILING

Re: Plaintiff's *First* Request to Continue Arguments on Motion to Disqualify
Counsel Due to Scheduling Conflict
Dare Investments LLC v. Chicago Title Insurance Company,
No. 2:10-cv-06088-DRD-MAS

Dear Judge Debevoise:

My Firm represents the interests of Plaintiff Dare Investments LLC in the matter above styled. Please allow this correspondence to serve as Plaintiff's Request to Continue the oral argument on Defendant's Motion to Disqualify Counsel, which is currently set for January 17, 2012. This is Plaintiff's first request to continue.

Plaintiff makes this Request because Defendant currently has scheduled a deposition of Plaintiff Dare Investments for the same day – January 17, 2012. The deposition, which was set earlier in time, will of course necessitate Plaintiff's counsel's and Defendant's counsel's attendance thereby creating a conflict with the currently scheduled oral arguments. The possibility of rescheduling the deposition is minimal considering the close of fact discovery occurs on February 9, 2012 and several other depositions have been set in New Jersey and Utah. See Doc. 56 at 1. Accordingly, Plaintiff respectfully requests the arguments be continued to February 21, 2012. Thank you.

Very Truly Yours,



Peter Kristofer Strojnik

Very Truly Yours,

/s/ Christopher Humphrey

Christopher Humphrey

CC:

Mike O'Donnell, Esq.
Derick Freijomil, Esq.
Jonathan Sandler, Esq.
Counsel for Defendant Chicago Title Ins. Co.

Via e-mail and ECF